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*Counsel for Audra Johnson*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	Chapter 11
	:	
LTL MANAGEMENT LLC,	:	Case No. 21-30589
	:	
Debtor.	:	
	:	

**DECLARATION OF AUDRA JOHNSON**

Pursuant to 28 U.S.C. § 1746, I, Audra Johnson, declare under penalty of perjury as follows:

1. I am an adult over the age of 18 years and have personal knowledge of the facts expressed in this declaration. If asked, I could and would testify to the truth of such facts.

2. For the last three years, I have worked as a loan processor for Sprout Mortgage LLC (“Sprout”). For each of the last two years at Sprout, my gross wages total over \$70,000. I received medical insurance from Sprout.

3. On September 17, 2021, I was diagnosed with peritoneal mesothelioma. I rely on Sprout’s medical insurance to cover my mesothelioma-related care and treatment, including surgical procedures and office visits.

4. On December 8, 2021, I underwent tumor debulking with HIPEC. My employer’s health insurance covered the expenses related to this procedure. During the procedure, cancer was removed from my diaphragm. That procedure has caused several complications. Even days after the HIPEC procedure, I was still experiencing significant pain throughout my body and any medications I took provided minimal relief and made me nauseous.

5. Complications related to the HIPEC procedure have worsened my quality of life. Around January 2022, I began experiencing chest pain. On January 30, 2022, I was seen in the emergency room because of worsening chest pain. On February 3, 2022, I went to urgent care and complained of chest pain that radiates to my jaw and shortness of breath. I then saw a pulmonologist who told me that my breathing issues stem from a problem with my diaphragm. My employer’s health insurance covered the expenses related to these visits.

6. On May 6, 2022, I had a visit with my treating surgeon Dr. Jonathan King. A true and correct copy of the Clinical Notes from that visit is attached hereto as **Exhibit A**. During that visit, Dr. King told me that complications related to the HIPEC surgery caused my breathing issues. My employer’s health insurance covered the expenses related to this visit.

7. On May 12, 2022, I had an office visit with Dr. Paul A. Toste, a thoracic surgeon at UCLA Health Thoracic Surgery Oncology in Santa Monica, California. A true and correct

copy of Dr. Toste's Clinical Notes is attached hereto as **Exhibit B**. The purpose of the visit was to discuss whether I need to have surgery on my right diaphragm because of my breathing difficulties. I was under the impression that my employer's health insurance covered the expenses related to this visit.

8. When I saw Dr. Toste, I told him about the breathing and other difficulties I have been experiencing because of my peritoneal mesothelioma. My breathing difficulties have negatively impacted my daily activities. For example, I can barely breathe after walking my dog for one block, I constantly need oxygen to help me breathe or otherwise recover, and I am unable to care for my daughter Marley or participate in her activities. In addition to my breathing difficulties, not a minute passes without me experiencing symptoms related to my peritoneal mesothelioma, including dry cough, decreased mobility, trouble sleeping, increased fatigue, body pain, and extreme chest pressure that feels like an elephant sitting on my chest. Dr. Toste recommended, upon completion and results of further workup, that I undergo intensive surgery. He also told me that any such surgery may be complicated by my prior HIPEC because of my elevated diaphragm on my right side and the liver sticking to my diaphragm. It was my understanding that my employer's health insurance will cover this upcoming procedure.

9. On May 12, 2022, I had a chest X-ray. A true and correct copy of the X-ray results is attached hereto as **Exhibit C**. It is my understanding that the results state that I have an elevated or paralyzed diaphragm on my right side and there is a buildup of fluid between the layers of tissue that line my lungs and chest cavity. I was under the impression that my employer's health insurance covered the expenses related to this procedure.

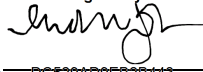
10. I was scheduled to have much-needed surgery to correct my elevated or paralyzed diaphragm on July 20, 2022. However, I can no longer undergo this procedure.

11. On July 6, 2022, Sprout abruptly shut its doors and I was laid off. I was caught off-guard by the announcement, which was held one day before payday. I also learned that my health insurance was retroactively terminated effective May 2022. I cannot afford any Continuation of Health Coverage, or COBRA, because it is too expensive.

12. Because I lack health insurance, my surgery scheduled for July 20, 2022, was canceled. This means that I will continue to have breathing difficulties for the foreseeable future. Also, I may be liable for the full amount of my medical visits from May 2022.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. I executed this Declaration at Tustin, California on July 19, 2022.

By:

DocuSigned by:  


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AUDRA JOHNSON